

REMARKS/ARGUMENTS

Reconsideration of the application is requested.

Claims 8 - 14 are now in the application. Claims 1 - 7 have been canceled.

Claims 8 - 14 are supported by, and fully based on, the original claims 1 - 7.

With regard to the rejection of the claims as being indefinite under 35 U.S.C. § 112, second paragraph, we have made all of the changes apparently requested by the Examiner. In addition, certain other amendments have been entered in light of the prior art rejections.

The further amendments to the claims may be summarized as follows:

- **Claim 8:** We have emphasized in claim 8 (previously claim 1) that the replay of the user's behavior in the browser simulator is correlated with the statistical information. We will return to this point.
- **Claim 12** (previously claim 5) emphasizes the fact that the behavior of a plurality of visitors is monitored and recorded, and that the browser simulation is generated from the behavior of several visitors.
- **Claim 14:** Similarly, claim 14 (previously claim 7) emphasizes the fact that we monitor and record a plurality of visitors and that the simulation is based on compiled data that represent the browser behavior of at least some of the site visitors thus monitored.

The title has been changed to correct the spelling of the term “voyeuristic.”

We now turn to the art rejection, in which claims 5 and 6 have been rejected as being anticipated by Duckett et al. (US 2003/0053420 A1, hereinafter “Duckett”) under 35 U.S.C. § 102, claims 1-4 have been rejected as being obvious over Duckett under 35 U.S.C. § 103, and claim 7 has been rejected as being obvious over Duckett in view of Hentzel et al. (US 6,877,007, hereinafter “Hentzel”) under 35 U.S.C. § 103. We respectfully traverse on the basis of the amended claims.

The central system in Duckett, upon being initiated, sends configuration information to individual applets at the work station to be monitored. From there, the applets record and send the information to the central unit in accordance with the respective applet configuration. After processing, Duckett’s central system then is able to play back the user’s interaction with the various electronic pages that the user has visited. One may say that this is a replay of the recorded information “from the perspective of the user.”

As such, we acknowledge and appreciate the rejection of claim 1. We respectfully submit, however, that there is no sequence in Duckett that could be read on the first three steps of claim 1, namely, (a) displaying an initial page, (b) prompting for statistical information, and (c) returning to a first content screen. See, for instance, Figs. 7C and 7D of the instant application. Claim 8, as amended, is further clarified with regard to the statistical information. Here, we actually use the statistical information in the recording of the user’s actions and/or in the generation of the replay from the perspective of the user.

Duckett does not integrate any such information in his recording or in the replay.

There, the selection of a given link by a user triggers the applet to call to the central system with an “activation notification,” p. 1, para. [0007] and for the configuration to be sent to the applet without regard to “statistical information.” Since, therefore, there is no collection of such statistical information, Duckett cannot use same to generate the replay.

At least for the foregoing reasons, claim 8 is patentable over the prior art.

With regard to claim 12 – which provides for a “statistical amalgam” of visitation behavior – we record at least one action for each of a plurality of site visitors. These several actions are then used to statistically compile the stored information and to generate the replay. That is, the amalgam is formed of the behavior of many site visitors.

Duckett records the behavior of (a plurality of) site visitors. But each visitor is treated separately and independently of the other. There is no suggestion in Duckett that would point to combining the stored activity of several site visitors and then to generate the replay.

At least for the foregoing reasons, claim 12 is patentable over the prior art.

With regard to claim 14, we have emphasized that the browser simulator is capable of taking from the behavior organization module compiled data and to present the

compiled data in a browser display. The “compiled data,” of course, is compiled from the site visitation behavior of a plurality of users.

Duckett does not compile data that pertains to the behavior of several users. Everything in Duckett points to the behavioral monitoring of individual users as distinct and separate entities.

We understand that the secondary reference Hentzel was cited with regard to the “event termination module.” We acknowledge that teaching. The secondary reference, however, cannot make up for the above-outlined shortcomings of the primary reference. Hentzel does not fairly suggest modifying Duckett towards the claimed invention, as defined in claims 8, 12, and 14.

In summary, none of the references, whether taken alone or in any combination, either show or suggest the features of the independent claims 8, 12, and 14. These claims are, therefore, patentable over the art and since all of the dependent claims are ultimately dependent on claim 8 or 12, they are patentable as well.

In view of the foregoing, reconsideration and the allowance of claims 8 -14 are solicited.

No monies are believed to be due with this response. However, the Office is herewith authorized to charge any fees which might be due with respect to Sections 1.16 and 1.17 to the Deposit Account of Lerner Greenberg Sterner LLP, No. 12-1099 during the pendency of the application.

Respectfully submitted,

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